

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LEONARD CORA DIAZ

DEBTOR

CASE NO 23-00103 EAG

CHAPTER 13

**DEBTOR'S REPLY TO *TRUSTEE'S OBJECTION TO CONFIRMATION*
DOCKET NO. 12**

TO THE HONORABLE COURT:

COMES NOW, LEONARD CORA DIAZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's 341 Minutes and Objection to Confirmation*, Docket No. 12, whereby the Trustee objects the confirmation of the Debtor's proposed *Chapter 13 Plan*, Docket No. 4, in the above captioned case. The Trustee's objections are summarized as follows:

- the Debtor to provide evidence of being current in the DSO payments that become due post-petition from February, 2023;
- submit evidence of filing 2022 tax return;
- the Debtor to amend Schedule "C" since the Debtor is using a d1 exemption for an inheritance property and for a vacant lot of land;
- the L.V. is pending to be determined (TBD);
- the Debtor to provide appraisal and/or comparable for a vacant lot of land listed under Schedule A/B line 1.1;
- the Debtor to provide missing paystubs from December 2022 related to the Debtor's commissions; and
- the Debtor to verify amounts from income and commissions in SCMI and Schedule "I".

2. The Debtor hereby respectfully replies to the Trustee's objections as follows:

- on February 21, 2023, the Debtor submitted to the Trustee (uploaded to the Trustee's system) evidence of being current in the DSO payments, specifically, the Debtor provided to the Trustee a copy of the December/2022 and January, February/2023 DSO payments;
- the Debtor is pending to file his 2022 tax return with the Department of Treasury, the Debtor to provide to the Trustee a copy of said 2022 tax return within the next

30 days;

---on February 23, 2023, the Debtor filed a *Debtor's Amended Schedule C*, Docket No. 13, whereby the Debtor is claiming the correct exemptions for the Debtor's hereditary interest in a property he uses as his residence (d1) and for the Debtor's vacant lot of land (d5);

---as to the "market value" of the Debtor's lot of land listed under Schedule A/B item 1.1, the Debtor to provide to the Trustee, within the next 30 days, further information/documents to sustain the value given to said property;

---on February 16, 2023, the Debtor sent to the Trustee (uploaded to the Trustee's system) copy of missing commissions paystubs from December/2022; and

---on February 16, 2023 the Debtor filed a *Debtor's Amended Schedule I*, Docket No. 11 to clarify the Debtor's income and commissions as requested by the Trustee.

3. The Debtor hereby respectfully replies to the Trustee's objection to Plan confirmation (Docket No. 12), in the above captioned case.

WHEREFORE, the Debtor respectfully prays that the Trustee's objection to Plan confirmation, Docket No. 12, be denied, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and I also certify that I have mailed by United States Postal Service copy of this motion to the following CM/ECF non-participant: the Debtor, Leonard Cora Diaz, PO Box 1954 Las Piedras PR 00771, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 23rd day of February, 2023.

/s/ **Roberto Figueroa Carrasquillo**

USDC #203614

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